

Gerry Bishop
PO Box 1131
Niceville, FL 32588

December 20, 2002

Federal Communications Commission
Washington, DC

RE: Petition for Reconsideration filed by Glen Clark and Associates (December 12, 2002) regarding FCC Docket MM 99-325

Mr. Chairman, Members of the Commission:

Glen Clark and Associates has filed their petition calling for deployment of IBOC at night in the AM band. The petition seems to conclude that IBOC adds no interference, or no significant interference, to stations on adjacent channels.

I am aware of one test of IBOC at night, and it was quite apparent that adjacent channel interference is a significant factor. The nighttime tests from WOR 710, done this autumn, created interference to WGN 720, making WGN unlistenable while the IBOC was on. This was consistent and apparent during the entire period of testing. WGN offered a clear and audible signal here, unless the WOR IBOC was on. (This may be less of a factor inside a set contour, of course, but over long range, this is a problem.) Interference was also apparent on 700, though I chose to focus on 720 and did not do more than check 700.

This interference causes me two concerns. One is that, had WOR been using IBOC on the night the DC snipers were captured, would any truckers east of WLW been listening? Would one of them have heard the description of the snipers' car given over WLW? It was a lucky set of circumstances that stopped the snipers at that time. In another few hours, they too would know that the car was wanted, and would have found alternate transportation. Undoubtedly, they would have found more victims in the DC area. There are still some wide-area audiences for some high power stations. To interfere with that, as IBOC at night does, cannot be in the interests of public service or the public good.

I'm not saying that IBOC itself is bad, but the adjacent channel interference is bad. As it will not stop at the borders, I'm also concerned about the various broadcast treaties, and how this interference will be addressed. Several of the Canadian, Mexican, and Caribbean stations program for large areas, not just a local audience. How will this adjacent channel interference affect their programming and audience service?

Until such time as the adjacent channel interference is reduced, ideally eliminated, it is much too early for nighttime deployment of IBOC. The limited performance to date indicates that IBOC at night will create interference problems, but very few listeners will have a radio capable of the digital reception. In other words, IBOC is, at present, poised to make trouble all night, but there will be no public benefit for it.

Gerry Bishop